

Kerry A. Denton (CA State Bar Number 147206)
DENTON LAW GROUP
333 H Street, Suite 5000
Chula Vista, CA 91910
Telephone: (619) 421-1000
Email: kerry@dentonlawgroup.com

Attorney For Debtors

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF CALIFORNIA**

In Re:) Case No.: 1601727-LA13
)
Jeff M. & HEATHER TAYLOR)
) DECLARATION OF DEBTOR IN
) OPPOSITION TO TRUSTEE'S MOTION
Debtor(s).) TO DISMISS CHAPTER 13 CASE
)
) Hearing Date: July 7, 2021
) Hearing Time: 11:00 AM
) Department: 2 Room: 118
) Jacob Weinberger
) United States Bankruptcy Court
) 325 West "F" Street
) San Diego, CA 92101
)
) Honorable Louise DeCarl Adler

I, Heather Taylor, Debtor in the above referenced case, make this declaration in opposition to the Trustee's motion to dismiss chapter 13 case.

1. I have been making my payments and did not realize I was going past the 60 month time line. The 60 months was March 30, 2021.

2. Upon receiving the Trustee's motion to dismiss, I made a payment to the Chapter 13 trustee in the full pay off amount in May 2021.

3. On Friday, June 4, 2021, I called the Chapter 13 Trustee's Office and spoke with "Cheryl" and "Bernice." I asked if my attorney was going to have to file an opposition. They confirmed that the payment had been received and I was informed that Mr. Billingslea, Jr. would be reviewing this over the weekend to see if the motion to dismiss should be withdrawn.

1 4. My attorney had informed me that shortly after I had made the final payment that
2 he emailed the Chapter 13 Trustee's Office to see if an opposition would have to be filed. As
3 of today, my attorney had not received any emails in return. Although, "Bernice" indicated
4 she did not see that email.

5 4. I understand that my attorney is charging \$540.00 for the fees and costs of this
6 opposition and I have no opposition to those fees being made through the Chapter 13 plan, or
7 to the extent that it is easier to pay my attorney directly so as not to impede closing of my
8 case, I agree to do so.

9 I declare under penalty of perjury that the foregoing is true and correct.

10
11 Dated: June 4, 2021

/S/HEATHER TAYLOR
HEATHER TAYLOR, Debtor